

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION**

BENJAMIN CRAIG, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CENTURYLINK, INC., GLEN F. POST,  
III, AND R. STEWART EWING JR.,

Defendants.

No. 3:17-cv-01005-SMH-JPM (Lead)  
No. 3:17-cv-01033-SMH-JPM (Member)  
No. 3:17-cv-01065-SMH-JPM (Member)

Judge S. Maurice Hicks, Jr.

Magistrate Judge Joseph H. L. Perez-Montes

CLASS ACTION

INTER-MARKETING GROUP USA,  
INC., Individually and On Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

CENTURYLINK, INC., GLEN F. POST,  
III, R. STEWART EWING, JR., and  
DAVID D. COLE,

Defendants.

No. 3:17-cv-01648-RGJ-JPM

Judge Robert G. James

Magistrate Judge Joseph H. L. Perez-Montes

CLASS ACTION

**MOTION OF LEAD PLAINTIFF OREGON  
FOR CONSOLIDATION OF RELATED ACTION**

Court-appointed Lead Plaintiff the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund (“Oregon”), respectfully moves this Court for entry of an Order: (1) consolidating *Inter-Marketing Group USA, Inc. v. CenturyLink, Inc.*, No. 3:17-cv-01648 (W.D. La.) (“*IMG*”), with the *CenturyLink* “Consolidated Securities Action” pursuant to Rule 42(a) of the Federal Rules of Civil Procedure;<sup>1</sup> (2) striking the December 26, 2017 lead plaintiff deadline purportedly triggered by the notice of pendency of *IMG*, published October 25, 2017 (the “*IMG* Notice”); (3) declaring any motions seeking appointment as lead plaintiff filed in response to the *IMG* Notice untimely under the strict deadline set by the Private Securities Litigation Reform Act of 1995; (4) requiring publication of a corrected notice clarifying that the lead plaintiff deadline in fact expired on August 21, 2017; and (5) for any such further relief as the Court may deem just and proper.

This Motion is based on the accompanying Memorandum of Law in support thereof, the Declaration of F. Williams Sartor, Jr. filed herewith, the pleadings and other filings herein, and any such other written or oral argument as may be permitted by the Court.

Dated: December 21, 2017

Respectfully Submitted,

/s/ Fred Williams Sartor, Jr.

Fred Williams Sartor, Jr.  
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<sup>1</sup> The “Consolidated Securities Action” refers to the following substantially similar securities class actions that were previously consolidated by Magistrate Judge Perez-Montes: *Craig v. CenturyLink, Inc.*, No. 3:17-cv-01005-SMH-JPM (“*Craig*”); *Thummeti v. CenturyLink, Inc.*, No. 3:17-cv-01033-SMH-JPM (“*Thummeti*”); and *Scott v. CenturyLink, Inc.*, No. 3:17-cv-01065-SMH-JPM (“*Scott*”). See generally *Craig v. CenturyLink, Inc.*, No. 3:17-CV-01005, 2017 WL 4785647 (W.D. La. Oct. 19, 2017).

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*Special Assistant Attorneys General and Counsel for Lead Plaintiff the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund, and Lead Counsel for the Class*

**CERTIFICATE OF CONSENT**

Pursuant to Local Rule 7.4.1, the undersigned hereby certifies to this Honorable Court that, on December 21, 2017, counsel for Lead Plaintiff Oregon conferred with counsel for Defendants, Inter-Marketing Group USA, Inc. (“IMG”), and KBC Asset Management NV (“KBC”), respectively, and requested their consent to Oregon’s motion for consolidation of *IMG* with the Consolidated Securities Action. The undersigned further certifies that: (i) Defendants’ counsel communicated that Defendants consent to consolidation; (ii) KBC’s counsel communicated that KBC does not take a position on consolidation; and (iii) IMG’s counsel communicated that IMG does not consent to consolidation.

Dated: December 21, 2017

/s/ Fred Williams Sartor, Jr.

Fred Williams Sartor, Jr.

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, December 21, 2017, I electronically filed the above Motion of Lead Plaintiff Oregon for Consolidation of Related Action using the CM/ECF system, which will automatically send email notification of such filing to all attorneys of record.

/s/ Fred Williams Sartor, Jr.

Fred Williams Sartor, Jr.